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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MARK CARLO,	)	
	)	
Plaintiff,	)	
	)	No.
vs.	)	
	)	
PORTFOLIO RECOVERY ASSOCIATES, LLC	)	
	)	JURY DEMANDED
Defendant.	)	

COMPLAINT  
JURISDICTION

1. The jurisdiction of this Court attains pursuant to the FDCPA, 15 U.S.C. § 1692k(d), 28 U.S.C. § 1331, 28 U.S.C. § 1332, the FCRA, 15 U.S.C. Section 1681(p) and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of the Judicial District of Nevada as Plaintiff's claims arose from acts of the Defendant perpetrated therein.

PRELIMINARY STATEMENT

2. This action is instituted in accordance with and to remedy Defendant's violations of the Federal Fair Debt Collection Practices Act, 15 U.S.C § 1692 et seq. (hereinafter "FDCPA"), state law obligations brought as supplemental claims hereto and Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et. seq.* ("FCRA").

PARTIES

3. Plaintiff, Mark Carlo, is a natural person who resides in Henderson, Nevada, and is a "consumer" as defined by 15 U.S.C. § 1692a(3) and allegedly owes a "debt" as defined by 15 U.S.C. § 1692a(5).

4. Defendant, Portfolio Recovery Associates, LLC (PRA), is a foreign Limited Liability Company, the principal purpose of whose business is the collection of debts, operating a debt collection agency from its principal place of business in Norfolk, VA, and regularly collects or attempts to collect debts owed or due or asserted to be owed or due another, and is a "debt collector" as defined by 15 U.S.C. § 1692a(6).

5. Defendant is also a furnisher of information as contemplated by FCRA § 1681s-2(a) & (b), who regularly and in the ordinary course of business furnishes information to one or more consumer reporting agencies about consumer transactions or experiences with any consumer.

FACTUAL ALLEGATIONS

6. Plaintiff(s) repeat, reallege and assert all factual allegations contained in the preliminary statement to this Complaint and reassert them as incorporated in full herein.

7. Plaintiff is a victim of fraud.

8. Plaintiff was recently rejected for employment due to fraudulent collection accounts reported on his credit profiles.

9. On June 9, 2020 Defendant dunned Plaintiff \$11,284.37 (Exhibit 1).

10. On June 23, 2020 Plaintiff wrote Defendant advising of his refusal to pay (Exhibit 2).

11. Exhibit 2 also advised Defendant its account was *fraudulent*.

12. Defendant received Exhibit 2 on June 26, 2020 (Exhibit 3).

1           13. Plaintiff's written refusal to pay required Defendant cease and desist all collection  
2 communications in accordance with FDCPA § 1692c(c):

3                   (c) **Ceasing communication** - *If a consumer notifies a debt*  
4                   *collector in writing that the consumer refuses to pay a debt or that*  
5                   *the consumer wishes the debt collector to cease further*  
6                   *communication with the consumer, the debt collector shall not*  
7                   *communicate further with the consumer with respect to such debt.*

8           14. On July 28, 2020 Plaintiff disputed Defendant's reporting (Exhibit 4).

9           15. Plaintiff explicitly advised Defendant he was betrayed by his deceased spouse  
10 (Exhibit 4).

11           16. Exhibit 4 reflects Plaintiff's summary of events leading to serial frauds.

12           17. Plaintiff provided his former spouse's Death Certificate (Exhibit 4).

13           18. Notwithstanding Defendant's knowledge of the fraud, on September 1, 2020  
14 Defendant again dunned Plaintiff for over \$11,000 (Exhibit 5).

15           19. Exhibit 5 was sent in violation of FDCPA §§ 1692c and 1692d. *Cruz v.*  
16 *International Collection Corp.*, 673 F.3d 991, 998 (9<sup>th</sup> Cir. 2012).

17           20. An excerpt from Plaintiff's September 17, 2020 Experian credit report is attached  
18 as Exhibit 6.

19           21. Exhibit 6 reflects Defendant's continued reporting of its fraudulent account.

20           22. Exhibit 6 likewise reflects Defendant's failure to report the account as disputed.

21           23. The presence of the subject tradelines on Plaintiff's credit profiles violates  
22 FDCPA §§ 1692e and 1692e(8) and has impaired Plaintiff's access to financing. *Brady v. Credit*  
23 *Recovery Co., Inc.*, 160 F.3d 64 (1st Cir. 1998).

24           24. On September 22, 2020 Defendant likewise reported its account on Plaintiff's  
25 Trans Union report *again without any dispute notation* (Exhibit 7).

26           25. Defendant's relentless reporting prompted Plaintiff to initiate additional disputes  
27 during late September (Exhibits 8, 9 and 10).  
28

1           26.     On October 15, 2020 Defendant deleted its fraudulent account (Exhibit 11).

2           27.     Defendant's failure to note Plaintiff's dispute was in explicit violation of FCRA  
3     § 1681s-2(b)(1)(C), (D) and (E). Gorman v. Wolpoff & Abramson, LLP, 584 F.3d 1147, 1162-  
4     64 (9<sup>th</sup> Cir. 2009).

5           28.     Plaintiff has no way of knowing, short of discovery, precisely how Plaintiff's  
6     dispute was conveyed to Defendant, *but is entitled to a presumption it did so*. Shulick v.  
7     Experian, 2011 WL 4346335 (E.D.Pa.), Fishback v. HSBC Retail Services Inc., 944 F.Supp.2d  
8     1098, 1113 (D. New Mexico 2013).

9           29.     In its indifference, Defendant ignored basic credit reporting industry standards.  
10    Cassara v. DAC Services, Inc., 276 F.3d 1210, 1225 (10<sup>th</sup> Cir. 2002).

11          30.     In failing to correct Plaintiff's tradeline, Defendant continued to report *patently*  
12    *inaccurate* information in violation of the FCRA. Drew v. Equifax Information Services, LLC,  
13    690 F.3d 1100, 1108 (9<sup>th</sup> Cir. 2012).

14          31.     In failing to appropriately revise Plaintiff's tradeline, Defendant provided  
15    *misleading* information which likewise violated the FCRA, Drew v. Equifax Information  
16    Services, LLC, 690 F.3d 1100, 1108 (9<sup>th</sup> Cir. 2012).

17          32.     Defendant was precluded from making any report either patently wrong or  
18    "missing crucial data" or otherwise misleading. Kuns v. Ocwen Loan Servicing, LLC, 611  
19    Fed.Appx. 398 (U.S. Ct. of Appeals, Ninth Circuit 2015).

20          33.     Defendant violated FCRA § 1681s-2(b)(1)(E)(i) in its failure to provide additional  
21    information explicating the status of Plaintiff's account. Bush v. Roundpoint Mortg. Servicing  
22    Corp., 122 F.Supp.3d 1347, 1351 (2015).

23          34.     Plaintiff has suffered meaningful emotional distress including, but not limited to,  
24    excessive worry, frustration, sleeplessness, anger, humiliation, embarrassment, chagrin and other  
25    mental anguish as a direct result of Defendant's conduct. McCollough v. Johnson, Rodenburg &  
26    Lauinger, LLC, 637 F.3d 939, 957 (9<sup>th</sup> Cir. 2011).

**STATEMENT OF CLAIM AS AGAINST DEFENDANT**


35. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

- a. By willfully and/or negligently failing to comport with FCRA § 1681s-2(b).

**PRAYER FOR RELIEF**

THEREFORE, Plaintiff prays that the court grant the following relief as against Defendant:

- a) actual damages;
- b) punitive damages;
- c) attorney's fees; and
- d) costs.



MITCHELL D. GLINER, ESQ.  
Nevada Bar #003419  
3017 W. Charleston Blvd. #95  
Las Vegas, Nevada 89102  
Attorney for Plaintiff



Portfolio Recovery  
Associates, LLC

Account Number: 5213331050921130  
Seller: SYNCHRONY BANK  
Merchant: SAMS CLUB  
Original Creditor: SYNCHRONY BANK  
Creditor to Whom Debt is Owed: PORTFOLIO RECOVERY  
ASSOCIATES, LLC ("PRA, LLC")  
Balance: \$11,284.37

06/09/2020

Dear MARK CARLO,

### We know life happens.

Every day PRA, LLC works with people to resolve their debt. We would love to do the same for YOU.

Sincerely,  
PRA, LLC

Choose a savings plan that works for you.



Pay 1 payment  
of \$9,591.71  
and save \$1,692.66



Pay 12 consecutive monthly  
payments of \$846.33  
and save \$1,128.41



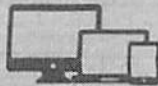
Pay 24 consecutive monthly  
payments of \$446.67  
and save \$564.29

The savings will be applied to the balance and your account will be considered paid-in-full for less than the full balance after your final payment is successfully posted.

\*Savings percentages are approximate. We are not obligated to renew this offer.

Your first payment must be received by: 07/13/2020

Start your recovery today.



Choose your plan and pay online anytime.

[www.PRApay.com](http://www.PRApay.com)

Pay over the phone by calling toll-free 1-800-772-1413

**This communication is from a debt collector and is an attempt to collect a debt.  
Any information obtained will be used for that purpose.**

Notice: See Reverse Side for Important Information

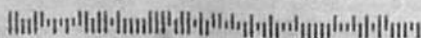
56M2

DEPT 922  
PO BOX 4115  
CONCORD CA 94524

Account Number: 5213331050921130

Payment Amount: \_\_\_\_\_

CHANGE SERVICE REQUESTED



MARK CARLO

Pay Online at [www.PRApay.com](http://www.PRApay.com)  
or mail to:

PORTFOLIO RECOVERY ASSOCIATES, LLC  
P.O. Box 12914  
Norfolk VA 23541

EXHIBIT 1

**June 23, 2020**

**Via Certified Mail**

**Portfolio Recovery Associates, LLC  
P.O. Box 12914  
Norfolk, VA 23541**

**Re: Carlo, Mark/Synchrony Bank**

**Dear Sir,**

**I've reviewed your recent correspondence. The account is fraudulent. This is neither a request for validation nor dispute, but rather, a refusal to pay.**

**Thank you in advance for your anticipated courtesy.**


**Sincerely,**

**Mark Carlo**

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIONWIDE COVID-...

**USPS Tracking®**[FAQs >](#)**Track Another Package +****Track Packages  
Anytime, Anywhere**Get the free Informed Delivery® feature to receive  
automated notifications on your packages[Learn More](#)<https://reg.usps.com/xsell?app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action>**Tracking Number: 70190700000034059494**[Remove X](#)

Your item was delivered at 10:31 am on June 26, 2020 in NORFOLK, VA 23502.

 **Delivered** June 26, 2020 at 10:31 am  
Delivered  
NORFOLK, VA 23502**Get Updates** 

---

**Text & Email Updates**

---

**Tracking History**

---

**Product Information**

---

**See Less** **Can't find what you're looking for?**



July 28, 2020

**CERTIFIED MAIL**

Experian Information Solutions, Inc.  
P.O. Box 4500  
Allen, TX 75013

**Re: Carlo, Mark J. / Dispute**

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my Social Security Card and Driver License. My attorney helped me prepare this letter to ensure you have all the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Mark J. Carlo; Spouse: Deceased; current address: ; prior address: 1861 Via Delle Arti Street, Henderson, NV 89044; SSN-  
date of birth: , 1961.

Please delete the noted Portfolio Recovery Associates (PRA) collection account. PRA is attempting to collect an alleged \$11,284 Synchrony Bank account. I have *never* had an account with Synchrony Bank.

My late wife, Rosemarie Carlo, established this account without my knowledge. I never once used either a Synchrony Bank card or otherwise used Synchrony's services. Rosemarie, 55, died 9/2/19. I've attached a copy of her Death Certificate. Approximately two (2) weeks after Rosie's death her employer provided me a folder containing numerous credit card statements, invoices and other financial documents (which she'd obviously hid from me). The overwhelming difficulty in dealing with the death of my wife of thirty (30) years and the burden of solely caring for our surviving children was greatly compounded by this terrible fraud and betrayal. Please **DO NOT** verify this account without first obtaining an application reflecting my signature-none exists!

I've also provided a copy of my July 9, 2020 utility invoice reflecting my new Henderson, Nevada address. I lived at my prior address, 1861 Via Delle Arti Street, Henderson, NV 89044, for ten (10) years.

Thank you in advance for your anticipated courtesy.

Very truly yours,

  
Mark J. Carlo

Enclosures

EXHIBIT 4

## MARK JOHN CARLO | Report # 2135-8064-76 for 07/18/20

Date opened Jan 2006  
Address ID # 0740587174  
Type Credit card  
Responsibility Individual

First reported Oct 2017  
Terms Not reported  
Monthly payment Not reported  
Credit limit or original amount \$11,300  
High balance \$11,358

Recent balance Not reported  
Status Closed  
Comment: Account closed at credit grantor's request.  
This item was updated from our processing of your dispute in Jul 2020  
Date of Status Dec 2019

## Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2019												CLS
2018												
2017												

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Nov19	Oct19
AB (\$)	11	10,098
DPR	Nov14	Oct21
SPA (\$)	11	200
AAP (\$)	ND	ND

Between Oct 2019 and Nov 2019, your credit limit/high balance was \$11,300

CITIFIN A.A. # 410089017365 PO BOX 61009 DUXY PA 15110-0090

Date opened Dec 2009  
Address ID # 0811125275  
Type Credit Card  
Responsibility Individual

First reported Sep 2016  
Terms Not reported  
Monthly payment \$3,845 written off \$513 past due as of Jul 2020.  
Credit limit or original amount \$3,200  
High balance \$3,845

Recent balance \$3,770 as of Jul 2020  
Status Account charged off.  
This account is scheduled to continue on record until Apr 2025  
Comment: Account closed at credit grantor's request.  
This item remained unchanged from our processing of your dispute in Jul 2020.  
Date of Status Jan 2019

## Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020												
2019												
2018												
2017												
2016												

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Jun20	May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19	May19	Apr19
AB (\$)	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,795	3,765	3,820	3,820
DPR	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jun05	Jun05	Mar20	Mar20
SPA (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

	Mar19	Feb19	Jan19	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18
AB (\$)	3,845	3,845	3,845	3,780	3,795	3,692	3,600	3,505	3,410
DPR	Dec13	Dec13	Dec13	Dec13	Apr20	Apr20	Apr20	Apr20	Apr20
SPA (\$)	ND	ND	ND	681	735	619	531	435	332
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND

Between Jul 2018 and Jun 2020, your credit limit/high balance was \$3,200

PORTFOLIO RECOVERY ASSOCIATES Partial Acct # 521334105092 120 CORPORATE BLVD STE 100 NORFOLK VA 23502 (844) 675-8408

Date opened Feb 2020  
Address ID # 0740587174  
Original creditor SYNCHRONY BANK  
Type Debt Buyer  
Responsibility Individual

First reported Jun 2020  
Terms 1 Month  
Monthly payment Not reported  
Credit limit or original amount \$11,284  
High balance Not reported

Recent balance \$11,284 as of Jul 2020  
Status Collection account.  
This account is scheduled to continue on record until Apr 2025.  
Date of Status Feb 2020

## Payment history

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020												

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Jun20
AB (\$)	11,284
DPR	ND
SPA (\$)	ND
AAP (\$)	ND

The original amount of this account was \$11,284

**Your accounts in good standing** These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years. Each of the items in this section has a positive payment history, meaning that no delinquencies or derogatory statuses are reported in the displayable payment history.

KOHLS/CAPONE Partial Acct # 539301045637 PO BOX 3115 MEWAUKEE WI 53201 (800) 454-5778





STATE OF NEVADA CERTIFICATION OF VITAL RECORD									
DEPARTMENT OF HEALTH AND HUMAN SERVICES DIVISION OF PUBLIC AND BEHAVIORAL HEALTH VITAL STATISTICS CERTIFICATE OF DEATH									
CASE FILE NO. 4101983		2019017672 STATE FILE NUMBER							
TYPE OR PRINT IN PERMANENT BLACK INK	1a DECEASED NAME (FIRST, MIDDLE, LAST, SUFFIX) Rosemarie Elizabeth CARLO		2 DATE OF DEATH (Mo/Day/Year) September 02, 2019		3a COUNTY OF DEATH Clark				
	3b CITY, TOWN, OR LOCATION OF DEATH Las Vegas		3c HOSPITAL OR OTHER INSTITUTION (Name; if not other, give street and city) Nathan Adelson Hospice		3d If Hosp or Inst indicate DCA, OCH, etc. (if Hosp or Inst specify) Hospice Facility (HFS)		4 SEX Female		
DECEDENT	5 RACE (Specify) White		6 Hispanic Origin? Specify No - Non-Hispanic		7a AGE - Last birthday (Years) 55		7b UNDER 1 YEAR MOS DAYS HOURS MINS		8 DATE OF BIRTH (Mo/Day/Year) November 13, 1963
IF DEATH OCCURRED IN INSTITUTION SEE HANDBOOK REGARDING COMPLETION OF RESIDENCE ITEMS	9a STATE OF BIRTH (If not USCA, name country) Ohio		9b CITIZEN OF WHAT COUNTRY United States		10 EDUCATION 16		11 MARITAL STATUS (Specify) Married		12 SURVIVING SPOUSE'S NAME (Last name prior to the marriage) Mark CARLO
	13 SOCIAL SECURITY NUMBER		14a USUAL OCCUPATION (Give Kind of Work Done During Most of)		14b KIND OF BUSINESS OR INDUSTRY		Ever in US Armed Forces? Yes No		
PARENTS	15a RESIDENCE - STATE Nevada		15b COUNTY Clark		15c CITY, TOWN OR LOCATION Las Vegas		15d STREET AND NUMBER 4262 Blue Diamond Dr. 102-253		15e HOUSE OR APARTMENT? Yes No
	16 FATHER/PARENT - NAME (First Middle Last Suffix) Anthony NARO				17 MOTHER/PARENT - NAME (First Middle Last Suffix) Elizabeth GRESKO				
DISPOSITION	18a INFORMANT - NAME (Type or Print) Mark CARLO		18b MAILING ADDRESS (Street or R.F.D. No, City or Town, State, Zip) 4262 Blue Diamond Dr. 102-253 Las Vegas, Nevada 89139						
	19a BURIAL, CREMATION, REMOVAL, OTHER (Specify) Cremation		19b CEMETERY OR CREMATORY - NAME La Paloma Funeral Services		19c LOCATION City or Town State Las Vegas Nevada 89122				
TRADE CALL	20a FUNERAL DIRECTOR - SIGNATURE (Or Person Acting as Such) RAYMOND L. ODDENS Jr		20b FUNERAL DIRECTOR LICENSE NUMBER FD923		20c NAME AND ADDRESS OF FACILITY Giddens Memorial Chapel 3475 W Post Rd Las Vegas NV 89118				
	TRADE CALL - NAME AND ADDRESS								
CERTIFIER	21a To the best of my knowledge, death occurred at the time, date and place and due to the cause(s) stated (Signature & Title) KANG CHOI DO		22a On the basis of examination and/or investigation, in my opinion death occurred at the time, date and place and due to the cause(s) stated (Signature & Title)						
	21b DATE SIGNED (Mo/Day/Year) September 08, 2019		21c HOUR OF DEATH 14:52		22b DATE SIGNED (Mo/Day/Year)		22c HOUR OF DEATH		
REGISTRAR	21d NAME OF ATTENDING PHYSICIAN IF OTHER THAN CERTIFIER (Type or Print)		21e NAME OF ATTENDING PHYSICIAN IF OTHER THAN CERTIFIER (Type or Print)		22d PRONOUNCED DEAD (Mo/Day/Year)		22e PRONOUNCED DEAD AT (Hour)		
	23a NAME AND ADDRESS OF CERTIFIER (Physician, Attending Physician, Medical Examiner, or Coroner) (Type or Print) Kang Choi DO 2160 N Rainbow Las Vegas, NV 89105		23b LICENSE NUMBER DO2569						
CAUSE OF DEATH	24a REGISTRAR (Signature) NANCY HARRY		24b DATE RECEIVED BY REGISTRAR (Mo/Day/Year) September 09, 2019		24c DEATH DUE TO COMMUNICABLE DISEASE YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>				
	25 IMMEDIATE CAUSE (ENTER ONLY ONE CAUSE PER LINE FOR (a), (b), AND (c)) PART I (a) Breast Cancer Metastatic To Bone And Liver		Interval between onset and death						
CONDITIONS IF ANY WERE GIVEN AS TO IMMEDIATE CAUSE STATING THE UNDERLYING CAUSE LAST	(b) DUE TO, OR AS A CONSEQUENCE OF		Interval between onset and death						
	(c) DUE TO, OR AS A CONSEQUENCE OF		Interval between onset and death						
	(d) DUE TO, OR AS A CONSEQUENCE OF		Interval between onset and death						
	(e) DUE TO, OR AS A CONSEQUENCE OF		Interval between onset and death						
PART II - OTHER SIGNIFICANT CONDITIONS - Conditions contributing to death but not resulting in the underlying cause given in Part I								26 AUTOPSY (Specify Yes or No) No	
27a AGE, SEX, RACE, HOW, WHEN, OR PLACE OF BIRTH (Specify)		27b DATE OF BIRTH (Mo/Day/Year)		27c HOUR OF BIRTH		27d DESCRIBE HOW BIRTH OCCURRED			
28a INJURY AT WORK (Specify Yes or No)		28b PLACE OF INJURY - At home, farm, street, factory, office, building, etc. (Specify)		28c LOCATION STREET OR R.F.D. No CITY OR TOWN STATE					
STATE REGISTRAR									
<p>CERTIFIED TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE WITH THE REGISTRAR OF VITAL STATISTICS, STATE OF NEVADA. This copy was issued by the Southern Nevada Health District from State certified documents authorized by the State Board of Health pursuant to NRS 440.175.</p> <p>DATE ISSUED: SEP 19 2019 By: <i>[Signature]</i></p> <p>This Copy not valid unless prepared on engraved border stamp by State, date and signature of Registrar.</p> <p>SOUTHERN NEVADA HEALTH DISTRICT - P.O. Box 3302 - Las Vegas, NV 89127 - 702.756-1010 - Fax 702.756-1073</p> <p>ANY ALTERATION OR ERASURE VOID THIS CERTIFICATE</p>									



3000160402219222123

MARK J. CARLO

2282 KEEGO HARBOR ST

07-09-2020

PAGE 1 OF 2



C A09 B09

MARK J. CARLO

**Electric Usage: Residential Service****Average Daily Electric Usage**

Average Daily  
Cost this month **\$4.14**

1100  
978  
856  
733  
611  
489  
367  
244  
122  
0

**Usage in total electric kilowatt hours**

□ Last Year      □ This Year

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

**Meter Information**

If NV Energy is unable to read your meter because of circumstances beyond control, you may be billed based on estimated usage for that billing period.

Meter#	Type	Service Period	Bill Days	Previous	Current	Multiplier	Usage
CC029931647	kWh	Jun 4, 2020 to Jul 6, 2020	32	61,050	62,130	1	1,080

**Charge Details**

Electric Consumption (Prior Rate)	843.000	kWh	x	0.10853	91.49
Electric Consumption (New Rate)	237.000	kWh	x	0.10698	25.35
Deferred Energy Adjustment (Prior Rate)	843.000	kWh	x	0.00246 CR	2.07 CR
Deferred Energy Adjustment (New Rate)	237.000	kWh	x	0.00261 CR	0.59 CR
Temp. Green Power Financing	1,080.000	kWh	x	0.00070	0.76
Renewable Energy Program	1,080.000	kWh	x	0.00039 CR	0.42 CR
Energy Efficiency Charge	1,080.000	kWh	x	0.00258	2.76
Tax Reduction	1,080.000	kWh	x	0.00361 CR	3.90 CR
Basic Service Charge					12.50
Local Government Fee				5%	6.29
Universal Energy Charge	1,080.000	kWh	x	0.00039	0.42

**Total Electric Service Amount****\$132.59**

**Customer Service:** (702) 402-5555 or (800) 331-3103 Toll Free 24/7, excluding holidays **Emergencies:** (702) 402-2900  
**Para servicio en español:** (702) 402-5554. TDD/TTY: 711 - Hearing impaired service available 24/7 days a week.

Please return this portion with payment - to ensure timely processing do not use staples or tape

**ACCOUNT NUMBER:** 3000160402219222123**Customer Number:** 1604022

**Service  
Address:**

**Please Pay By:** Jul 27, 2020  
**\$127.59**

**Enter Amount  
Enclosed:** \$

**Payment Options:**

Online at [nvenergy.com](http://nvenergy.com) or call (844) 343-3719  
 At any of our authorized Shop & Pay locations  
 By phone: (800) 253-8084 (debit/credit card)  
 By mail: PO Box 30150, Reno, NV 89520-3150

07/09/20 1:30 PM 0 00160402219222123 0000012759 0000013259 0 009

MARK J. CARLO



89520



3000160402219222123 0000012759 0000013259 0 009

Portfolio Recovery  
Associates, LLC

09/01/2020 X

Dear MARK CARLO,

**We know life happens.**

Every day PRA, LLC works with people to resolve their debt. We would love to do the same for **YOU**.

Sincerely,  
PRA, LLC

#### Account Details

Account Number: 5213331050921130  
Seller: SYNCHRONY BANK  
Merchant: SAMS CLUB  
Original Creditor: SYNCHRONY BANK  
Creditor to Whom Debt is Owed: PORTFOLIO RECOVERY ASSOCIATES, LLC ("PRA, LLC")  
Balance: \$11,284.37

#### Choose a savings plan that works for you.



Pay 1 payment  
of \$9,591.71  
and save \$1,692.66



Pay 12 consecutive monthly  
payments of \$846.33  
and save \$1,128.41



Pay 24 consecutive monthly  
payments of \$446.67  
and save \$564.29

The savings will be applied to the balance and your account will be considered paid-in-full for less than the full balance after your final payment is successfully posted.

Within approximately 30 days of your final payment successfully posting, we will request that the three major credit reporting agencies delete our tradeline related to your account from your credit bureau report.

**\*Savings percentages are approximate. We are not obligated to renew this offer.**  
**Your first payment must be received by: 10/05/2020**

#### Start your recovery today.



**Choose your plan and pay online anytime.**

[www.PRApay.com](http://www.PRApay.com)

Pay over the phone by calling toll-free 1-800-772-1413

**This communication is from a debt collector and is an attempt to collect a debt.**  
**Any information obtained will be used for that purpose.**

Notice: See Reverse Side for Important Information

56M2

DEPT 922  
PO BOX 4115  
CONCORD CA 94524

Account Number: 5213331050921130

Payment Amount: \_\_\_\_\_

CHANGE SERVICE REQUESTED



MARK CARLO

Pay Online at [www.PRApay.com](http://www.PRApay.com)  
or mail to:

PORTFOLIO RECOVERY ASSOCIATES, LLC  
P.O. Box 12914  
Norfolk VA 23541

**EXHIBIT 5**



PO Box 9701  
Allen, TX 75013



0001969 01 AB 0.416 \*\*AUTO HO 1 7225 89052-857382 -C01-P01970-1  
MARK CARLO



MARK CARLO

Your Credit Report

Report # 1606-0193-35 for 09/17/20

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record.

The fastest and easiest way to dispute most information that you disagree with is by creating your member login at [experian.com/disputes](http://experian.com/disputes). Keep track of any changes and dispute notifications online. You can also call with disputes or questions at 833 210 4610, M - F 9am - 5pm in your time zone, or submit your dispute in writing by mailing to Experian, NCAC, PO BOX 9701, Allen TX 75013. Be advised that written information or documents you provide with respect to your disputes may be shared with all creditors with which you are disputing.

#### Payment History Legend

Current	Account 150 days past due	Voluntarily surrendered	Defaulted on contract
Account 30 days past due	Account 180 days past due	Repossession	Collection
Account 60 days past due	Creditor received deed	Paid by creditor	Charge off
Account 90 days past due	Foreclosure proceedings started	Insurance claim	Closed
Account 120 days past due	Foreclosed	Claim filed with government	No data for this time period

\*If your creditor reported your account balances to us, we list them in this section as additional information about your account.

#### Medical Information

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

**Your accounts that may be considered negative** The most common items in this section are late payments, accounts that have been charged off or sent to collection, and bankruptcies. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments may remain on the credit report for up to seven years. Chapters 7, 11 and 12 bankruptcies may remain on the credit report for up to 10 years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

#### Credit items

BANK OF AMERICA Partial Acct # 140088291605 PO BOX 982238 EL PASO TX 79998 (800) 421-2110											
Date opened	First reported	Recent balance	Payment history								
Jan 2006	Oct 2017	Not reported	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Address ID #	Terms	Status	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
0740587174	Not reported	Closed.	2019	2018	2017	2016	2015	2014	2013	2012	2011
Type	Monthly payment										
Credit card	Not reported										
Responsibility	Credit limit or original										
Individual	amount										
	\$11,300										
	High balance										

0099376334

page 1 of 8

EXHIBIT 6

7725 01 00001969 0001 0004256

MARK CARLO | Report # 1606-0193-35 for 09/17/20

\$11,368

**Comment:**  
Account closed at credit  
grantor's request.  
This item was updated  
from our processing of  
your dispute in Jul 2020.  
**Date of Status**  
Dec 2019

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Nov19	Oct19
AB (\$)	11	10,095
DPR	Nov14	Oct21
SPA (\$)	11	200
AAP (\$)	ND	ND

Between Oct 2019 and Nov 2019, your credit limit/high balance was \$11,300

CITI Partial Acct # 410039017365 PO BOX 6190 SIOUX FALLS SD 57117 (866) 378 6467

Date opened	First reported	Recent balance	Payment history
Dec 2009	Sep 2016	\$3,770 as of Sep 2020	
Address ID #	Terms	Status	
0740587174	Not reported	Account charged off.	2020 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Type	Monthly payment	\$3,845 written off. \$627	2019 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Credit Card	Not reported	past due as of Sep 2020.	2018 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Responsibility	Credit limit or original	This account is	2017 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Individual	amount	scheduled to continue on	2016 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
	\$3,200	record until Apr 2025.	
	High balance	<b>Comment:</b>	
	\$3,845	Account closed at credit	
		grantor's request.	
		This item remained	
		unchanged from our	
		processing of your	
		dispute in Jul 2020.	
		<b>Date of Status</b>	
		Jan 2019	

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Aug20	Jul20	Jun20	May20	Apr20	Mar20	Feb20	Jan20	Dec19	Nov19	Oct19	Sep19	Aug19	Jul19	Jun19
AB (\$)	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,770	3,795	3,795
DPR	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jul12	Jun05	Jun05
SPA (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	May19	Apr19	Mar19	Feb19	Jan19	Dec18	Nov18	Oct18	Sep18	Aug18	Jul18	Jun18	May18	Apr18	Mar18
AB (\$)	3,820	3,820	3,845	3,845	3,845	3,780	3,795	3,692	3,600						
DPR	Mar29	Mar29	Dec13	Dec13	Dec13	Dec13	Apr20	Apr20	Apr20						
SPA (\$)	ND	ND	ND	ND	ND	681	735	619	531						
AAP (\$)	ND	ND	ND	ND	ND	ND	ND	ND	ND						

Between Sep 2018 and Aug 2020, your credit limit/high balance was \$3,200

PORTFOLIO RECOVERY ASSOCIATES Partial Acct # 521333105092 120 CORPORATE BLVD STE 100 NORFOLK VA 23502 (844) 675 3408

Date opened	First reported	Recent balance	Payment history
Feb 2020	Jun 2020	\$11,284 as of Aug 2020	
Address ID #	Terms	Status	
0512002161	1 Months	Collection account.	2020 Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Original creditor	Monthly payment	\$11,284 past due as of	
SYNCHRONY BANK	Not reported	Aug 2020.	
Type	Credit limit or original	This account is	
Debt Buyer	amount	scheduled to continue on	
Responsibility	\$11,284	record until Apr 2025.	
Individual	High balance	<b>Date of Status</b>	
	Not reported	Feb 2020	

Account History \* (AB = Account Balance, DPR = Date Payment Received, SPA = Scheduled Payment Amount, AAP = Actual Amount Paid)

	Jul20	Jun20
AB (\$)	11,284	11,284
DPR	ND	ND
SPA (\$)	ND	ND
AAP (\$)	ND	ND

The original amount of this account was \$11,284

**Your accounts in good standing** These items may stay on your credit report for as long as they are open. Once an account is closed or paid off it may continue to appear on your report for up to ten years. Each of the items in this section has a positive payment history, meaning that no delinquencies or derogatory statuses are reported in the displayable payment history.

KOHLSCHAPONE Partial Acct # 639805015437 PO BOX 3115 MILWAUKEE WI 53201 (800) 564 5740



File Number: 408625625  
Date Issued: 09/22/2020

Page: 1 of 6



## Personal Information

SSN: XXX-XX-4350

You have been on our files since 06/01/1983

Date of Birth: 05/10/1961

Names Reported: MARK JOHN CARLO and MARK NARO

## Addresses Reported:

Address	Date Reported	Address	Date Reported
1861 VIA DELLE ARTI, LAS VEGAS, NV 89044-0257	09/22/2020	1861 VIA DELLE ARTI, HENDERSON, NV 89044-0257	11/23/2010
	08/14/2020	4262 BLUE DIAMOND RD APT 102263, LAS VEGAS, NV 89139-7789	11/10/2015
4262 BLUE DIAMOND RD, LAS VEGAS, NV 89139-7789	05/03/2016	PO BOX 401448, LAS VEGAS, NV 89140-1448	08/03/2015
2861 KINKNOCKIE WAY, HENDERSON, NV 89044-0250	11/24/2009	1383 SHADOW HAVEN LN, LAS VEGAS, NV 89183-6894	02/24/2006
1383 SHADOW HVN, L V, NV 89183	07/06/2008	102-263 4262 BLUE DIAMOND RD, LAS VEGAS, NV 89139	11/11/2015
2121 E WARM SPRINGS RD APT 1093, LAS VEGAS, NV 89119-0493	08/01/1999	19350 PARKMOUNT AVE, CLEVELAND, OH 44135-1710	

## Telephone Numbers Reported:

(702) 523-1793 (702) 343-0944 (702) 343-0945 (702) 617-3588

## Employment Data Reported:

Employer Name	Date Verified	Location	Position	Date Hired
CUYAHOGA CNTY COMMON PLEAS CT	06/01/1993	CLEVELAND, OH	PROCESSOR	10/01/1991
JONES DAY ETAL	09/01/1984	CLEVELAND, OH	LAW CLERK	

## Account Information

Typically, creditors report any changes made to your account information monthly. This means that some accounts listed below may not reflect the most recent activity until the creditor's next reporting. This information may include things such as balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand some of the account information that could be reported.

### Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with them. The ratings in the key below describe the payments that may be reported by your creditors. Any rating that is shaded indicates that it is considered adverse. Please note: Some but not all of these ratings may be present in your credit report.

N/R	X	OK	30	60	90	120	COL	VS	RPO	C/O	FC
Not Reported	Unknown	Current	30 days late	60 days late	90 days late	120+ days late	Collection	Voluntary Surrender	Repossession	Charge Off	Foreclosure

### Remark Key

Additionally, some creditors may notate your account with comments each month. We refer to these creditor comments as "Remarks". The key below gives the descriptions of the abbreviated remarks contained in your credit file. Any remark containing brackets > < indicates that this remark is considered adverse.

CBG CLOSED BY CREDIT GRANTOR >PRL< UNPAID BALANCE CHARGED OFF

## Adverse Accounts

**BANK OF AMERICA #440066291605\*\*\*\*** (PO BOX 982238, EL PASO, TX 79998-2235, (800) 421-2110)

Date Opened: 01/20/2006	Balance: \$0	Pay Status: Current; Paid or Paying as Agreed
Responsibility: Individual Account	Date Updated: 12/24/2019	Terms: Paid Monthly
Account Type: Revolving Account	Last Payment Made: 12/11/2019	Date Closed: 12/23/2017
Loan Type: CREDIT CARD	High Balance: \$11,368	Date Paid: 12/11/2019
	Credit Limit: \$11,300	>Maximum Delinquency of 120 days in 09/2018 and in 04/2019<

Remarks: CLOSED BY CREDIT GRANTOR; CLOSED

	11/2019	10/2019	09/2019	08/2019	07/2019	06/2019	05/2019	04/2019	03/2019	02/2019	01/2019	12/2018
Rating	OK	30	30	OK	OK	OK	OK	120	120	120	120	120
	11/2018	10/2018	09/2018	08/2018	07/2018	06/2018	05/2018	04/2018	03/2018	02/2018	01/2018	12/2017
Rating	120	120	120	90	60	30	OK	OK	OK	30	60	60
	11/2017	10/2017										
Rating	30	OK										

To dispute online go to: <http://transunion.com/disputeonline>

# EXHIBIT 7



Consumer Credit Report for MARK JOHN CARLO

File Number: 408625625 Date Issued: 09/22/2020

**CITICARDS CBNA #410039017365\*\*\*\*** (5800 SOUTH CORPORATE PLACE, SIOUX FALLS, SD 57108, (855) 378-6467)

Date Opened: 12/16/2009  
 Responsibility: Individual Account  
 Account Type: Revolving Account  
 Loan Type: FLEXIBLE SPENDING CREDIT CARD

Date Updated: 09/14/2020  
 Last Payment Made: 07/12/2019

Pay Status: Charged Off  
 Terms: Paid Monthly  
 Date Closed: 09/15/2018  
 Maximum Delinquency of 120 days in 10/2018  
 for \$580 and in 12/2018 for \$771

Credit Limit: Credit limit of \$3,200 from 03/2018 to 09/2020

Estimated month and year that this item will be removed: 05/2025

	09/2020	08/2020	07/2020	06/2020	05/2020	04/2020	03/2020	02/2020	01/2020	12/2019	11/2019	10/2019
Balance	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770	\$3,770
Scheduled Payment		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Amount Paid		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Past Due	\$627	\$570	\$513	\$456	\$399	\$342	\$285	\$228	\$171	\$114	\$57	\$0
High Balance	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845
Remarks	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL
Rating	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O
	09/2019	08/2019	07/2019	06/2019	05/2019	04/2019	03/2019	02/2019	01/2019	12/2018	11/2018	10/2018
Balance	\$3,770	\$3,770	\$3,795	\$3,795	\$3,820	\$3,820	\$3,845	\$3,845	\$3,845	\$3,780	\$3,795	\$3,692
Scheduled Payment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$681	\$735	\$619
Amount Paid	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Past Due	\$1,301	\$1,244	\$1,212	\$1,155	\$1,123	\$1,066	\$1,033	\$975	\$871	\$771	\$708	\$580
High Balance	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,845	\$3,795	\$3,795	\$3,692
Remarks	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG/PRL	CBG	CBG	CBG
Rating	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	C/O	120	120	120
	09/2018	08/2018	07/2018	06/2018	05/2018	04/2018	03/2018	02/2018	01/2018	12/2017	11/2017	10/2017
Balance	\$3,600	\$3,505	\$3,410	\$3,323	\$3,234	\$2,990	\$3,130					
Scheduled Payment	\$531	\$435	\$332	\$245	\$111	\$109	\$106					
Amount Paid	\$0	\$0	\$0	\$0	\$0	\$0	\$0					
Past Due	\$449	\$320	\$198	\$0	\$0	\$0	\$0					
High Balance	\$3,600	\$3,505	\$3,410	\$3,323	\$3,234	\$3,187	\$3,187					
Rating	90	60	30	OK	OK	OK	OK	OK	OK	OK	OK	OK
	09/2017	08/2017	07/2017	06/2017	05/2017	04/2017	03/2017	02/2017	01/2017	12/2016	11/2016	10/2016
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK

**PORTFOLIO RECOVERY #521333105092\*\*\*\*** (120 CORPORATE BLVD, SUITE 100, NORFOLK, VA 23502, (844) 675-3407)

Placed for collection: 02/20/2020  
 Responsibility: Individual Account  
 Account Type: Open Account  
 Loan Type: DEBT BUYER

Balance: \$11,284  
 Date Updated: 08/27/2020  
 Original Amount: \$11,284  
 Original Creditor: SYNCHRONY BANK (Banking)  
 Past Due: \$11,284

Pay Status: In Collection

Remarks: PLACED FOR COLLECTION

Estimated month and year that this item will be removed: 06/2025

**Satisfactory Accounts****KOHL'S DEPARTMENT STORE #639305045437\*\*\*\*** (PO BOX 3115, MILWAUKEE, WI 53201, (800) 564-5740)

Date Opened: 08/04/2006  
 Responsibility: Individual Account  
 Account Type: Revolving Account  
 Loan Type: CHARGE ACCOUNT

Balance: \$0  
 Date Updated: 03/13/2016  
 Payment Received: \$0  
 Last Payment Made: 12/30/2012  
 High Balance: \$499  
 Credit Limit: \$500

Pay Status: Current; Paid or Paying as Agreed  
 Terms: Paid Monthly  
 Date Closed: 02/29/2016  
 Date Paid: 12/30/2012

Remarks: INACTIVE ACCOUNT; CLOSED

	02/2016	01/2016	12/2015	11/2015	10/2015	09/2015	08/2015	07/2015	06/2015	05/2015	04/2015	03/2015
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK
	02/2015	01/2015	12/2014	11/2014	10/2014	09/2014	08/2014	07/2014	06/2014	05/2014	04/2014	03/2014
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK
	02/2014	01/2014	12/2013	11/2013	10/2013	09/2013	08/2013	07/2013	06/2013	05/2013	04/2013	03/2013
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK
	02/2013	01/2013	12/2012	11/2012	10/2012	09/2012	08/2012	07/2012	06/2012	05/2012	04/2012	03/2012
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK
	10/2011	09/2011	08/2011	07/2011	06/2011	05/2011	04/2011	03/2011	02/2011	01/2011	12/2010	11/2010
Rating	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK	OK

September 21, 2020

**CERTIFIED MAIL**

Equifax Information Services LLC  
P.O. Box 740241  
Atlanta, GA 30374

**Re: Carlo, Mark J. / Dispute**

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my Social Security Card and Driver License. My attorney helped me prepare this letter to ensure you have all the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Mark J. Carlo; Spouse: Deceased; current address:  
prior address: 1861 Via Delle Arti Street, Henderson, NV 89044; SSN  
date of birth: , 1961.

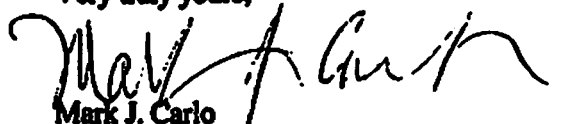
Please delete the noted Portfolio Recovery Associates (PRA) collection account. PRA is attempting to collect an alleged \$11,284 Synchrony Bank account. I have *never* had an account with Synchrony Bank.

My late wife, Rosemarie Carlo, established this account without my knowledge. I never once used either a Synchrony Bank card or otherwise used Synchrony's services. Rosemarie, 55, died 9/2/19. I've attached a copy of her Death Certificate. Approximately two (2) weeks after Rosie's death her employer provided me a folder containing numerous credit card statements, invoices and other financial documents (which she'd obviously hid from me). The overwhelming difficulty in dealing with the death of my wife of thirty (30) years and the burden of solely caring for our surviving children was greatly compounded by this terrible fraud and betrayal. Please **DO NOT** verify this account without first obtaining an application reflecting my signature-none exists!

Please likewise delete the noted Citibank, National Association charge-off account for precisely the same reasons. It was likewise fraudulently established by my late wife. I have been in touch with Citibank and it had neither my cell. number nor my email address on file.

Thank you in advance for your anticipated courtesy.

Very truly yours,

  
Mark J. Carlo

Enclosures

EXHIBIT 8

September 24, 2020

**CERTIFIED MAIL**

Trans Union LLC  
P.O. Box 2000  
Chester, PA 19016

Re: **Carlo, Mark J. / Dispute**

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my Social Security Card and Driver License. My attorney helped me prepare this letter to ensure you have all the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Mark J. Carlo; Spouse: Deceased; current address:  
prior address: 1861 Via Delle Arti Street, Henderson, NV 89044; SSN  
date of birth: 1961.

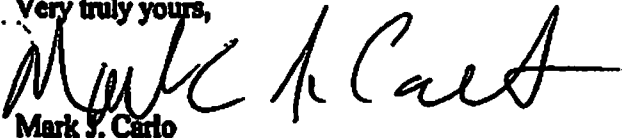
Please delete the noted Portfolio Recovery Associates (PRA) collection account. PRA is attempting to collect an alleged \$11,284 Synchrony Bank account. I have *never* had an account with Synchrony Bank.

My late wife, Rosemarie Carlo, established this account without my knowledge. I never once used either a Synchrony Bank card or otherwise used Synchrony's services. Rosemarie, 55, died 9/2/19. I've attached a copy of her Death Certificate. Approximately two (2) weeks after Rosie's death her employer provided me a folder containing numerous credit card statements, invoices and other financial documents (which she'd obviously hid from me). The overwhelming difficulty in dealing with the death of my wife of thirty (30) years and the burden of solely caring for our surviving children was greatly compounded by this terrible fraud and betrayal. Please **DO NOT** verify this account without first obtaining an application reflecting my signature-none exists!

Please likewise delete the noted Citibank, National Association charge-off account for precisely the same reasons. It was likewise fraudulently established by my late wife. I have been in touch with Citibank and it had neither my cell. number nor my email address on file. Last, please also delete the noted Bank of America account; it was also fraudulently begun by Rosemarie.

Thank you in advance for your anticipated courtesy.

Very truly yours,

  
Mark J. Carlo

Enclosures



September 25, 2020

**CERTIFIED MAIL**

Experian Information Solutions, Inc.  
P.O. Box 4500  
Allen, TX 75013

Re: Carlo, Mark J. / Dispute

Dear Sir,

This letter is a Dispute. I have attached an excerpt from my recent credit profile. I have also enclosed copies of both my Social Security Card and Driver License. My attorney helped me prepare this letter to ensure you have all the information you need to appropriately address my concerns. I have personally reviewed, approved and signed this letter.

I provide my personal information: Mark J. Carlo; Spouse: Deceased; current address:  
prior address: 1861 Via Delle Arti Street, Henderson, NV 89044; SSN  
date of birth: 1961.

Please delete the noted Portfolio Recovery Associates (PRA) collection account. PRA is attempting to collect an alleged \$11,284 Synchrony Bank account. I have *never* had an account with Synchrony Bank.

My late wife, Rosemarie Carlo, established this account without my knowledge. I never once used either a Synchrony Bank card or otherwise used Synchrony's services. Rosemarie, 55, died 9/2/19. I've attached a copy of her Death Certificate. Approximately two (2) weeks after Rosie's death her employer provided me a folder containing numerous credit card statements, invoices and other financial documents (which she'd obviously hid from me). The overwhelming difficulty in dealing with the death of my wife of thirty (30) years and the burden of solely caring for our surviving children was greatly compounded by this terrible fraud and betrayal. Please **DO NOT** verify this account without first obtaining an application reflecting my signature-none exists!

Please likewise delete the noted Citibank, National Association charge-off account for precisely the same reasons. It was likewise fraudulently established by my late wife. I have been in touch with Citibank and it had neither my cell. number nor my email address on file. Last, please also delete the noted Bank of America account; it was also fraudulently begun by Rosemarie.

Thank you in advance for your anticipated courtesy.

Very truly yours,

  
Mark J. Carlo

Enclosures

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EXHIBIT 10

\*\*\* 408625625-020 \*\*\*

TransUnion LLC  
PO Box 805  
Woodlyn, PA 19094-0805



10/15/2020



PCY03L00300145-1002305-074985887



MARK JOHN CARLO

Dear MARK JOHN CARLO,

We understand that recently something on your credit report did not seem right to you. We take this matter seriously, and we want to make sure your TransUnion credit report is accurate. It's our commitment to you.

Our investigation of the dispute you submitted is now complete. After a review of your dispute and any provided documentation, we took one or more of the following action(s):

1. Updated your credit report based on the information you provided; OR
2. Determined that the information you disputed either does not appear on your credit file or already shows the requested status; OR
3. Determined that the data furnisher had previously verified the reported information. If any of the items you disputed were previously verified, a separate communication was sent to you listing those items along with the data furnisher's contact information; OR
4. Asked the data furnisher reporting the information you disputed to do all of the following:
  - Review relevant information we sent them, including any provided documents
  - Investigate your dispute and verify whether the information they report is accurate
  - Provide us a response to your dispute and update any other information
  - Update their records and systems, if necessary;

Your dispute is important. In the pages that follow, you will see your detailed investigation results, including the name and contact details of the source of the information. Please review the results carefully. To view a full copy of your credit report and for more information about how to read your credit report, please visit [www.transunion.com/fullreport](http://www.transunion.com/fullreport).

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## How to Read Your Investigation Results

You will see that, for each disputed item, a summary explanation appears in the gray box, followed by a brief paragraph describing the results of our investigation, followed by a view of how the item appears in your updated credit report. Please note any changes we made to personal information (name, address, employment, SSN, date of birth) will appear at the end of Your Investigation Results.

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10/15/2020

Page 4 of 7

**INVESTIGATION RESULTS - DELETED:** The disputed item(s) was removed from your credit report.

**PORTFOLIO RECOVERY #521333105092\*\*\*\* ( 120 CORPORATE BLVD, SUITE 100, NORFOLK, VA 23502, (844) 875-3407 )**  
In response to your dispute, this item was **DELETED** from your credit report.

**company.**

